

**Appendix A to the Declaration of E. Evans Wohlforth, Esq.**

<b>Document Title/ECF No.</b>	<b>Basis for Sealing</b>	<b>Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted</b>	<b>Why a Less Restrictive Alternative to the Relief Sought is Not Available</b>	<b>Any Prior Order Sealing the Same Materials in the Pending Action</b>	<b>Party in Opposition to Sealing, if any, and Basis</b>
Letter dated February 18, 2025 [ECF No. 528]	Letter motion characterizes and quotes from communications between employees for Save On SP, LLC (“SaveOn”) discussing SaveOn’s communications with patients about its services and communications between patients and SaveOn, comprising proprietary business information. <i>See</i> ECF No. 528.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the letter motion is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn’s proprietary business information.	No	No objection
Exhibit 4 to letter dated February 18, 2025 [ECF No. 528]	Exhibit 4 is a letter from counsel for Johnson & Johnson Healthcare Systems Inc. (“J&J”) to counsel for SaveOn. The letter characterizes communications between employees for SaveOn about communications	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn’s proprietary business information.	No	No objection

	with patients about its services, comprising proprietary business information. <i>See</i> ECF No. 528 Ex. 4.				
Exhibit 12 to letter dated February 18, 2025 [ECF No. 528]	Exhibit 12 is an email from a patient on a SaveOn-advised plan. The email discusses the patient's experience filling her prescription and using SaveOn's services, comprising both proprietary business and confidential patient health information. <i>See</i> ECF No. 528 Ex. 12.	<p>If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.</p> <p>Patients would also be harmed by the disclosure of their confidential health information.</p>	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information and of patients' confidential health information.	No	No objection
Exhibit 13 to letter dated February 18, 2025 [ECF No. 528]	Exhibit 12 is an email chain between employees for SaveOn and Express Scripts, Inc. ("ESI") discussing the prescriptions of patients on a SaveOn-advised health plan and SaveOn's communications with the patients and plan, comprising proprietary business and confidential patient health	<p>If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.</p> <p>Patients would also be harmed by the disclosure of their confidential health information.</p>	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information and of patients' confidential health information.	No	No objection

	information. <i>See</i> ECF No. 528 Ex. 13.				
--	--	--	--	--	--